


UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

FILED

APR 13 2018

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY 

DEPUTY

XR

UNITED STATES OF AMERICA,  
*Plaintiff*

v.

RICARDO SERRANO,  
*Defendant*

§ Criminal No.:

§ **SA 18 CR 233**  
§ INFORMATION

§ [Violation:

§ Count 1: 18 U.S.C. § 922(a)(1)(A),  
§ Engaging in Business of Dealing Firearms  
§ without a License]  
§

THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE**

[18 U.S.C. § 922(a)(1)(A)]

Beginning in or about June 2016 and continuing through in or about December 2017, in  
the Western District of Texas, and elsewhere, the Defendant,

**RICARDO SERRANO,**

who not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United  
States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18,  
United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**

[See Fed.R.Crim.P. 32.2]

**I.**

**Firearms Violations and Forfeiture Statutes**

[Title 18 U.S.C. § 922(a)(1)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1),  
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]

As a result of the foregoing criminal violations set forth in Count One, the United States of America gives notice to Defendant **RICARDO SERRANO** of its intent to seek the forfeiture of the below described property upon conviction and pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

**Title 18 U.S.C. ' 924**

**(d)(1)** Any firearm or ammunition involved in or used in any . . . willful violation of any other provision of this chapter or any rule or regulation promulgated thereunder . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

**II.**

This Notice of Demand for Forfeiture includes, but is not limited to, the following property:

1. Spike's Tactical LLC, Model: ST-15 Crusader, multi-caliber rifle, bearing serial number DV031784;
2. Bravo Company, Model: BCM4, multi-caliber rifle, bearing serial number A039036;
3. Aero Precision, Model: M4E1, multi-caliber rifle, bearing serial number M400006261;
4. Core 15, Model: CORE15, multi-caliber rifle, bearing serial number GTOC100030;
5. Dreadnaught Industries, Model: DI-15, multi-caliber rifle, bearing serial number Z000334;
6. Any and all related ammunition and firearms accessories; and

**Money Judgment**

Money Judgment- A sum of money equal to One Hundred Seven Thousand Two Hundred Fifty Dollars (\$107,250.00) which represents the value of any proceeds obtained as a result of the violations set forth in Count 1 for which Defendant is liable.

**Substitute Assets**

If any of the property described above as being subject to forfeiture for the violations set forth above, as a result of any act or omission of Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

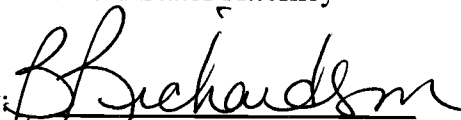
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America to seek forfeiture of any other property, up to the value of said money judgment, as substitute assets pursuant to Title 21 U.S.C. § 853(p) and Fed. R. Crim. P. 32.2(e)(1).

Respectfully submitted,

JOHN F. BASH  
United States Attorney

By:

  
BETTINA J. RICHARDSON  
Assistant United States Attorney